

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Lawrence Obstfeld, individually and
derivatively on behalf of Toev
Medical Corporation, and Ignition
Ventures, Inc.,

Case No. 07 Civ. 5847 (DAB)

Plaintiffs,

-against-

Motion to Admit Counsel
Pro Hac Vice

Arthur Schwartz, Ronald Solar,
Renaissance Biomedical, Inc.,
Glen Lieber, and ThermopectiX, Inc.,

Defendants.

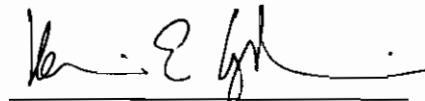
PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Court for the Southern District of New York, I, Kerin E. Coughlin, a member in good standing of the bar of this Court and counsel for defendants Ronald Solar, Renaissance Biomedical, Inc., Glen Lieber and ThermopectiX, Inc., hereby move for an Order allowing the admission pro hac vice of:

Laurie J. Miller
Fredrikson & Byron, P.A.
200 South Sixth Street, Ste. 4000
Minneapolis, Minnesota 55402-1425
(612) 492-7000
(612) 492-7077

Laurie J. Miller is a member in good standing of the Bars of the States of Minnesota and California. There are no pending disciplinary proceedings against Ms. Miller in any State or Federal court.

Dated: August 13, 2007
City, State: New York, New York

Respectfully submitted,



Kerin E. Coughlin (KC-2838)
Constantine Cannon LLP
450 Lexington Avenue, 17th Floor
New York, New York 10017
Phone: (212) 350-2700
Fax: (212) 350-2701

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**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

Lawrence Obstfeld, individually and
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Medical Corporation, and Ignition
Ventures, Inc.,

Plaintiffs,

-against-

Arthur Schwartz, Ronald Solar,
Renaissance Biomedical, Inc.,
Glen Lieber, and ThermopectiX, Inc.,

Defendants.

Case No. 07 Civ. 5847 (DAB)

**Affidavit of
Kerin E. Coughlin
In Support of Motion to Admit
Counsel Pro Hac Vice**

State of New York)
)
County of New York) ss:


Kerin E. Coughlin, being duly sworn, hereby deposes and says as follows:

1. I am an attorney at Constantine Cannon LLP, counsel for defendants Ronald Solar, Renaissance Biomedical, Inc. ("Renaissance"), Glen Lieber and ThermopectiX, Inc. ("ThermopectiX") in the above-captioned matter. I am familiar with the proceedings in this case. I make this statement based on my personal knowledge of the facts set forth herein and in support of said defendants' motion to admit Laurie J. Miller as counsel pro hac vice to represent them in this matter.
2. I am a member in good standing of the bar of the State of New York where I was admitted to practice law on October 22, 2003. I am also admitted to the bar of the United States District Court for the Southern District of New York, and am in good standing with this Court.
3. I have known Laurie J. Miller since 2006.
4. Ms. Miller is a Shareholder at Fredrikson & Byron, P.A., in Minneapolis, Minnesota.
5. I have found Ms. Miller to be a skilled attorney and a person of integrity. She is experienced in Federal practice and is familiar with the Federal Rules of Procedure.
6. Accordingly, I am pleased to move for the admission of Laurie J. Miller, pro hac vice.

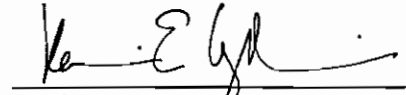
7. I respectfully submit a proposed Order granting the admission of Laurie J. Miller, pro hac vice, which is attached hereto as Exhibit A.

WHEREFORE it is respectfully requested that the motion to admit Laurie J. Miller, pro hac vice, to represent defendants Solar, Renaissance, Lieber and ThermopectiX in the above-captioned matter be granted.

Dated: August 10, 2007
City/State: New York, New York
Notarized:


Aristea Stavroulakis
Notary Public, State of New York
Qualified in Queens County
No 41-4820588
Term Expires 7/24/10

Respectfully submitted,


Kerin E. Coughlin (KC-2838)

STATE OF MINNESOTA IN SUPREME COURT

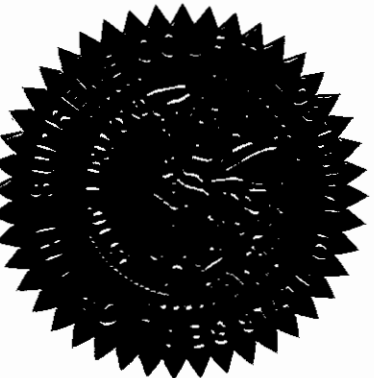
Certificate of Good Standing

This is to certify that the following lawyer is in good standing.

LAURIE J MILLER

was duly admitted to practice as an lawyer and counselor at law in all the courts of this state on

December 30, 1981



Given under my hand and seal of this court on

July 27, 2007

Fredrick K. Grittner

Fredrick K. Grittner
Clerk of Appellate Courts



THE
STATE BAR
OF CALIFORNIA

180 HOWARD STREET
SAN FRANCISCO, CALIFORNIA 94105-1639
TELEPHONE (415) 538-2000

July 30, 2007

TO WHOM IT MAY CONCERN:

This is to certify that according to the records of the State Bar, LAURIE JEAN MILLER, #111160 was admitted to the practice of law in this state by the Supreme Court of California on December 20, 1983; and has been since that date, and is at date hereof, an ACTIVE member of the State Bar of California; and that no recommendation for discipline for professional or other misconduct has ever been made by the Board of Governors or a Disciplinary Board to the Supreme Court of the State of California.

THE STATE BAR OF CALIFORNIA


Kath Lambert
Custodian of Membership Records

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

LAWRENCE OBSTFELD, individually and
derivatively on behalf of TOEV MEDICAL
CORPORATION, and IGNITION
VENTURES, INC.,

Plaintiffs,

– against –

ARTHUR SCHWARTZ, RONALD SOLAR,
RENAISSANCE BIOMEDICAL, INC., GLEN
LIEBER, and THERMOPEUTIX, INC.,

Defendants.

Case No. 07 Civ. 5847 (DAB)

ECF Case

CERTIFICATE OF SERVICE

I, BRIAN A. BUCHER, am over the age of eighteen years and not a party to the above-referenced matter. I am an employee of Constantine Cannon LLP, 450 Lexington Avenue, New York, New York 10017. On August 13, 2007, I caused to be served:


- Motion to Admit Laurie J. Miller *Pro Hac Vice*;
- Affidavit of Kerin E. Coughlin in Support of Motion to Admit *Pro Hac Vice*;
- proposed Order for Admission *Pro Hac Vice* on Written Motion; and
- this Certificate of Service

via U.S. Postal Mail and electronic mail on:

Marc Monoah Isaac, Esq. (counsel for Plaintiffs)
Law Office of Marc Monoah Isaac PLLC
210 Moore Avenue
Freeport, NY 11520; and

W. Cameron Beard, Esq. (counsel for Defendant Arthur Schwartz)
Blank Rome LLP
The Chrysler Building
405 Lexington Avenue
New York, NY 10174

Dated: August 13, 2007
New York, New York


BRIAN A. BUCHER